

Message

From: Ostaszewski, Arthur (EGLE) [OSTASZEWSKIA@michigan.gov]
Sent: 9/1/2021 7:02:45 PM
To: Finn, Molly [Finn.Molly@epa.gov]
CC: Voisin, Valerie [Voisin.Valerie@epa.gov]; Jacob Runge [RungeJ@michigan.gov]; ErberN [ErberN@michigan.gov]; ConfortiR@michigan.gov
Subject: EPA / EGLE Discussion Request - BASF NW

Molly, hope you and your family are doing good. Same to you Valerie as well.

I think Jacob has been trying to reach you guys for a couple weeks now to discuss some issues related to BASF NW.

It would be great to talk to your team before the BASF call next week...

Some issues I have brought up to thru Jacob that I think we need EPA assistance on include:

Toxicity - do you have access to a toxicologist assigned to the site? EGLE ran some toxicity screening assays on the June perimeter well split samples,

and several ground water locations were acutely toxic per the tests....like 100% toxic, potentially venting above a public water intake.

I believe the screening assay results warrant inclusion of toxicity as a RCRA parameter in the next round of perimeter sampling (Dec 2021), at least

at those wells that tested toxic, but preferably all of them from the Workplan.

Safe Drinking Water Act - do you have a knowledgeable contact at EPA on the Safe Drinking Water Act...particularly how EPA views the Critical Assessment Zone (CAZ),

and the Source Water Area Boundary (SWAB) delineations of a public water supply? Some of the perimeter BASF wells sampled in June,

and I believe the 30% design Funnel and Gate discharge location, are directly in the CAZ of the Wyandotte Public Supply Intake as identified in the Source Water Report (Wyandotte 2004).

In accordance with the SDWA, does that CAZ groundwater and any CAZ Funnel & Gate discharge need to meet Drinking Water Intake criteria?

We'd like you to bring in EPA Safe Drinking Water Act folks to weigh in on this issue of discharges and groundwater in a CAZ and SWAB.

Those are my immediate topics I'd like to hear EPAs thoughts on, and move forward with.

As well there are the June PFAS perimeter sampling results...We have had our five (5) EGLE split results for over 8 weeks and are ready to discuss them.

We have exceedances of PFAS and other parameters...BASF NW has not shared their results with EGLE and I assume you have not seen them either.

We anticipate BASF is on board with perimeter sampling on a routine semi-annual basis, but I have a suspicion they are not on board officially with that.

Thanks, Please set up a meeting with us at EGLE at your earliest convenience.

Art

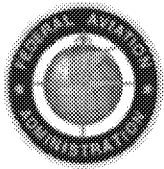
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